

AIR QUALITY
MANAGEMENT DISTRICT**TITLE V FEDERAL OPERATING PERMIT
STATEMENT OF BASIS****ADMINISTRATIVE PERMIT AMENDMENT**

APPLICATION NO.:	TV2010-03-01A
DATE:	September 29, 2011
REVIEWING ENGINEER:	Michelle Joe

A. FACILITY INFORMATION:

<u>FACILITY NAME:</u>	Campbell Soup Supply Company, LLC
<u>LOCATION:</u>	6200 Franklin Boulevard Sacramento, CA 95824
<u>MAILING ADDRESS:</u>	6200 Franklin Boulevard Sacramento, CA 95824
<u>RESPONSIBLE OFFICIAL:</u>	Brett Buatti, V.P. Manufacturing Sacramento Operations (916) 395-5110
<u>CONTACT PERSON:</u>	Jennifer Cornes, Environmental Project Engineer Sacramento Operations (916) 395-5137

B. PURPOSE OF THIS STATEMENT OF BASIS:

The Title V Federal Operating Permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose of this Statement of Basis is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this Statement of Basis, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

In addition to this Statement of Basis the information contained in the Statement of Basis for the 04-19-2011 Title V permit renewal and Title V permit 1st administrative amendment is applicable to the facility.

C. ADMINISTRATIVE PERMIT AMENDMENT DESCRIPTION:

Requested Amendment

In an e-mail dated September 7, 2011, Campbell Soup Supply Company, LLC identified that the emission rate units in the ROC emissions table for inkjet printing operations as listed in the Title V Permit No. TV2010-03-01 (Section V. Equipment Specific Requirements – Inkjet Printing Operations, Condition No.1) did not match the emission rate units in the SMAQMD Rule 201 Permit No. 22542 (Condition No. 7). Therefore, Campbell Soup Supply Company, LLC requested that the typographical error (in ***bold italic*** below) listed in the Title V Permit No. TV2010-03-01 be changed:

from:

The emissions from the inkjet printing operation (SMAQMD Permit to Operate No. 22542) shall not exceed the following limits:

[Basis: SMAQMD Rule 202]

Pollutant	Maximum Allowable Emissions	
	lb/quarter (A)	lb/year
ROC	82	1,500

(A) The daily ROC limit is based on all printers (26 present at the time of initial permitting) emitting ROC at maximum capacity for 24 hours/day).

to:

The emissions from the inkjet printing operation (SMAQMD Permit to Operate No. 22542) shall not exceed the following limits:

[Basis: SMAQMD Rule 202]

Pollutant	Maximum Allowable Emissions	
	lb/ <i>day</i> (A)	lb/ <i>quarter</i>
ROC	82	1,500

(A) The daily ROC limit is based on all printers (26 present at the time of initial permitting) emitting ROC at maximum capacity for 24 hours/day.

The request qualifies as an administrative permit amendment because correction of typographical errors in the Title V permit is listed as one of the qualifying actions in the definition of "Administrative Title V Permit Amendment" in SMAQMD Rule 207 Section 202.1.

This administrative permit amendment is made pursuant to SMAQMD Rule 207 Section 409.

Public Notice

SMAQMD Rule 207 Section 409 states that no public notice is required for a Title V administrative permit amendment.

Permit Distribution

The revised Title V Permit No. TV2010-03-01A will be provided to the permittee and to U.S. EPA Region IX.

Revised Permit Numbering

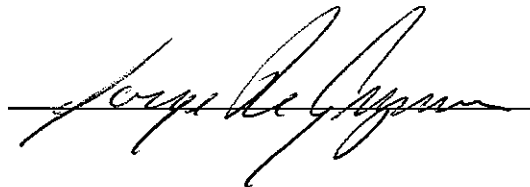
The new Title V permit number for the amended permit will be Title V Permit No. TV2010-03-01A.

The adding of sequential alphabetic letters to the current permit number (beginning with A for the first administrative amendment) indicates an administrative permit amendment.

Recommendation

Re-issue Title V Permit No. TV2010-03-01A with the administrative permit amendment.

REVIEWED BY:



DATE:

9/30/10

ATTACHMENT A

Title V Request for
Administrative Amendment
(dated September 7, 2011)

From: Jennifer Cornes [mailto:Jennifer_Cornes@campbellsoup.com]
Sent: Wednesday, September 07, 2011 7:50 AM
To: DON DUMAINE
Subject: Title V Permit Mistake

Hi Don,

I found a typo on the Title V permit for ink operations. The SMAQMD permit allows for 82 lb/day and 1500 lb/qrt of ROC emissions, but the Title V permit allows for 82 lbs/qrt and 1500 lbs/ year. The SMAQMD permit is correct. Sorry I did not notice this during the initial review.

Jennifer Cornes
Environmental Project Engineer
Campbell Soup Supply Company, L.L.C.
Sacramento Plant
Tel:(916) 395-5137 Fax:(916) 395-5156

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SACRAMENTO METROPOLITAN


AIR QUALITY
MANAGEMENT DISTRICT

PERMIT TO OPERATE

ISSUED TO: **CAMPBELL SOUP SUPPLY COMPANY**
EQUIPMENT LOCATION: **6200 FRANKLIN BOULEVARD, SACRAMENTO 95824**

PERMIT NO.	EQUIPMENT DESCRIPTION
22542	INKJET PRINTING OPERATION CONSISTING OF VARIOUS MANUFACTURER AND VARIOUS MODEL NUMBER INKJET PRINTERS

SUBJECT TO THE FOLLOWING CONDITIONS

GENERAL

1. ALL EQUIPMENT, FACILITIES AND SYSTEMS INSTALLED OR USED TO ACHIEVE COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE SHALL AT ALL TIMES BE MAINTAINED IN GOOD WORKING ORDER AND BE OPERATED AS EFFICIENTLY AS POSSIBLE SO AS TO MINIMIZE AIR POLLUTANT EMISSIONS.
2. THE AIR POLLUTION CONTROL OFFICER AND/OR AUTHORIZED REPRESENTATIVES, UPON THE PRESENTATION OF CREDENTIALS SHALL BE PERMITTED:
 - A. TO ENTER UPON THE PREMISES WHERE THE SOURCE IS LOCATED OR IN WHICH ANY RECORDS ARE REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26, PART 4, CHAPTER 3 OF THE CALIFORNIA HEALTH AND SAFETY CODE OR THE RULES AND REGULATIONS OF THE SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT.

DATE ISSUED: 01-18-2011
DATE EXPIRES: 02-24-2012 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY: Bruce Nixon

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

4. THE EQUIPMENT SHALL NOT DISCHARGE SUCH QUANTITIES OF AIR CONTAMINANTS OR OTHER MATERIALS WHICH CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO ANY CONSIDERABLE NUMBER OF PERSONS OR TO THE PUBLIC, OR WHICH ENDANGER THE COMFORT, REPOSE, HEALTH OR SAFETY OF ANY SUCH PERSONS OR THE PUBLIC, OR WHICH CAUSE, OR HAVE A NATURAL TENDENCY TO CAUSE, INJURY OR DAMAGE TO BUSINESS OR PROPERTY.
5. A LEGIBLE COPY OF THIS PERMIT TO OPERATE SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSIONS LIMITATIONS

6. THE INKJET PRINTING OPERATION SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR, WHICH ARE AS DARK OR DARKER THAN RINGELMANN NO. 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.
7. EMISSIONS FROM THE INKJET PRINTING OPERATION SHALL NOT EXCEED THE FOLLOWING LIMIT:

POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS	
	LB/DAY (A)	LB/QUARTER
ROC	82	1,500

(A) THE DAILY ROC LIMIT IS BASED ON ALL PRINTERS (26 PRESENT AT THE TIME OF INITIAL PERMITTING) EMITTING ROC AT MAXIMUM CAPACITY FOR 24 HOURS/DAY.

8. COMPLIANCE WITH THE QUARTERLY EMISSION LIMITATION SPECIFIED IN CONDITION NO. 7 SHALL BE DETERMINED AS FOLLOWS:

ROC EMISSIONS = (INKS USED, GAL/QUARTER) x (VOC CONTENT, LB/GAL)
(LB/QUARTER) + (MAKE-UP FLUID USED, GAL/QUARTER) x (VOC CONTENT, LB/GAL)
+ (CLEANING SOLUTION USED, GAL/QUARTER) x (VOC CONTENT, LB/GAL)

EQUIPMENT OPERATION

9. EACH INK JET PRINTER SHALL BE OPERATED AND MAINTAINED IN ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS.
10. ALL VOC-CONTAINING CLOTH OR PAPER USED FOR SURFACE PREPARATION OR EQUIPMENT CLEANUP SHALL BE STORED OR DISPOSED OF IN CLOSED CONTAINERS.

RECORD KEEPING

11. THE FOLLOWING RECORDS SHALL BE CONTINUOUSLY MAINTAINED ON-SITE FOR THE MOST RECENT FIVE-YEAR PERIOD AND SHALL BE MADE AVAILABLE TO THE SMAQMD AIR POLLUTION CONTROL OFFICER UPON REQUEST. QUARTERLY RECORDS AS SPECIFIED IN THE TABLE BELOW SHALL BE MADE AVAILABLE FOR INSPECTION WITHIN 30 DAYS FROM THE END OF THE CALENDAR QUARTER.

FREQUENCY	INFORMATION TO BE RECORDED
AT ALL TIMES	A. LIST OF CURRENTLY USED MATERIALS, INCLUDING THE FOLLOWING INFORMATION: I. MATERIAL TYPE BY NAME, CODE AND MANUFACTURER. II. VOC CONTENT OF EACH INK, MAKE-UP FLUID AND CLEANING SOLVENT AS-APPLIED INCLUDING WATER AND EXEMPT COMPOUNDS (GRAMS/LITER OR LB/GAL).
DAILY	B. DAILY RECORDS ARE NOT REQUIRED BECAUSE ALL PRINTERS ARE PERMITTED AT MAXIMUM CAPACITY FOR 24 HOURS/DAY.

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

FREQUENCY	INFORMATION TO BE RECORDED
QUARTERLY	C. USAGE OF EACH INK, MAKE-UP FLUID AND CLEANING SOLVENT AS-APPLIED INCLUDING WATER AND EXEMPT COMPOUNDS. [GALLONS/QUARTER]
	D. CALCULATION OF ROC EMISSIONS BY THE METHOD SPECIFIED IN CONDITION NO. 8. [LB ROC/QUARTER]

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT (SMAQMD), STATE AND FEDERAL AIR QUALITY RULES. THE FOLLOWING LISTED RULES ARE THOSE THAT ARE MOST APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. OTHER RULES MAY ALSO BE APPLICABLE.

<u>SMAQMD RULE NO.</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
301	STATIONARY SOURCE PERMIT FEES
401	RINGELMANN CHART
402	NUISANCE

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE MAY REFLECT SOME, BUT NOT ALL, REQUIREMENTS OF THESE RULES. THERE MAY BE OTHER CONDITIONS THAT ARE APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. FUTURE CHANGES IN PROHIBITORY RULES MAY ESTABLISH MORE STRINGENT REQUIREMENTS WHICH MAY SUPERSEDE THE CONDITIONS LISTED HERE.

FOR FURTHER INFORMATION PLEASE CONSULT YOUR SMAQMD RULEBOOK OR CONTACT THE SMAQMD FOR ASSISTANCE.